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ORIGINAL

54251

April 15, 1999

RE: Aging Airplane Inspections

U.S. Department of Transportation Dockets
Docket No. FAA-1999-5401 -4
400 Seventh St. SW.
Room Plaza 401
Washington, DC 20590

DEPT. of TRANSPORTATION
DOCKETS
APR 27 PM 4:10

To Whom it May Concern:

Eagle Jet Charter Airlines would like to go on record as being opposed to proposals in docket 1999-5401, as it now stands. Our reasons for opposition are as follows.

- It is and always has been the responsibility of the air carrier to ensure that the aircraft that are listed on their operation specifications are maintained in accordance with the operators inspection and maintenance program. Every operator has to have their maintenance and inspection program approved by the Flight Standards District Office where their certificate is issued. A principal maintenance inspector is assigned to that certificate holder to assist the carrier and ensure that they comply with all applicable FAR's, and their approved maintenance and inspection program, along with all procedures listed in the operators manuals. This system works well when the two parties cooperate and work together. To bring in a DAR or a FAA inspector to conduct an aircraft inspection and records review would place an unnecessary financial burden on either the operator if they choose to use a DAR or on the Federal Budget if an FAA inspector was used.
- The record items listed that would have to be made available for the DAR or FAA inspector are the very same records that a Chief Inspector and the PMI check on a regular basis. We keep hearing how overworked and understaffed the FAA is. If this is indeed the case where are the qualified and competent inspectors going to come from to inspect the aircraft and pertinent records? And what makes the DAR or the FAA inspector more qualified than the regular PMI or the operators quality Control inspectors to evaluate an aircraft and associated records?
- If a DAR, or an FAA inspector conducted a review and did not find any problems with an operators aircraft or records. Then six month latter a RASIP or NASIP team came in and found a problem in that very area. Or heaven forbid an aircraft is involved in an accident or incident, the FAA would still hold the operator responsible for any and all findings. So what is the point of contracting this task out, because you can not contract out the responsibility for the airworthiness of an aircraft. The responsibility is that of the operators and most operators are more knowledgeable and capable than an outsider who is unfamiliar with the air carriers programs and inspection procedures. It is an exercise that will not produce worthwhile results, and in our opinion it will not improve air safety to any degree.
- The NPRM suggest that the inspection be carried out at intervals not to exceed five (5) years, and be accomplished in conjunction with a scheduled inspection such a "C", or "D" check. Our current inspection schedule intervals are 2000 hours between "C" checks and 8000 hours or six (6) years between "D" check. Our average yearly utilization per aircraft is 1000 hours. To comply with the proposed rule we would have to do the inspection and record review each four (4) years or do a "C" or "D" check one year early. This would increase our heavv maintenance cost by 17%. More

consideration needs to be given to the time intervals due to the fact that different aircraft and air carriers operate in different environments and under a wide range of circumstances. All aging aircraft can not be treated equal, and be lumped together.

- Also of concern is the statement on page seventeen (17), which states; "Although it is the FAA's intent to carry out records reviews and inspections to the extent that the aircraft structure is accessible during the maintenance visit, the FAA may require additional access to determine that the maintenance of the airplane's age-sensitive parts and components has been adequate and timely". What criteria will be used to determine if additional access is required? As the statement now stands it appears that the inspector would have full authority to have an operators aircraft completely dismantled and totally disrupt the inspection schedule. Not to mention the financial burden this would place on the operator.

In summary; let the air carrier do the inspection and record review, and make available to the FAA any and all reports and findings necessary for their evaluation. Adjust the time period for each inspection and record review to match each operators program (this could be done with the help of the PMI). We do not need additional oversight in this area in order to maintain our fleet of aircraft in an airworthy condition.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Sidney Hurst". The signature is fluid and cursive, with a long horizontal stroke at the end.

Sidney Hurst
VP Maintenance
Eagle Jet Charter Airlines

cc: David Lotterer RAA